

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KIRK LANCE,

Plaintiff,

v.

ANCHORAGE LAUNCH SERVICE CO., IN  
PERSONAM; M/V TRIUMPH V, OFFICIAL  
NUMBER 539680, HER ENGINES,  
MACHINERY APPURTENANCES AND  
CARGO, IN REM,

Defendants.

IN ADMIRALTY

NO. 3:22-cv-05075-BJR

**STIPULATED MOTION AND  
ORDER TO CONTINUE TRIAL  
AND PRETRIAL DEADLINES**

The parties, by and through their respective attorneys of record, jointly move this court for a continuance of the trial and related pretrial deadlines pursuant to FRCP 16 (b)(4) as follows:

EVENT	CURRENT DEADLINE	PROPOSED NEW DEADLINE
JURY TRIAL DATE	April 10, 2023	August 14, 2023
Reports from expert witness under FRCP 26(a)(2) due	January 17, 2023	May 30, 2023
Discovery completed by	February 14, 2023	June 19, 2023
Dispositive motions	March 6, 2023	July 11, 2023
Joint pretrial Statement	March 13, 2023	July 17, 2023
Pretrial conference	March 27, 2023	July 31, 2023

STIPULATED MOTION AND ORDER TO CONTINUE  
TRIAL AND PRETRIAL DEADLINES- 1  
CASE NO. 3:22-cv-05075-BJR

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1 The request to continue is based on plaintiff's recent treatment of injuries at issue in  
2 this litigation. Plaintiff underwent bicep surgery on January 4, 2023. His recovery timeline is  
3 presently unknown. As a result, significant facts continue to develop, and critical tasks have  
4 been unavoidably delayed, which in turn has delayed experts on both sides from rendering  
5 opinions related to plaintiff's prognosis and need for future treatment, if any. Based on  
6 plaintiff's ongoing recovery from surgery, the parties respectfully assert that good cause for  
7 continuance of the trial date and pretrial deadlines is present.

8  
9 DATED this Wednesday, January 11, 2023.

10  
11  
12 LAW OFFICE OF JOHN MERRIAM

13 /s/ John W. Merriam  
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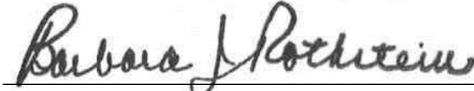
21  
22 BAUER MOYNIHAN & JOHNSON LLP

23 /s/ Thomas G. Waller  
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25 /s/ William P. Jensen  
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**ORDER**

Based upon the foregoing stipulation of the parties, the Trial Date is extended to August 14, 2023 and the corresponding pretrial deadlines are extended as listed above.

DATED this 11th day of January, 2022.

  
BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE